



Tel: 857.350.3519

May 13, 2019

Mr. Frank Battaglia **USEPA RCRA Corrective Action** 5 Post Office Square, Suite 100 Boston, MA 02109-3912

Mr. Jeffrey Crawford RI DEM Office of Waste Management 235 Promenade Street Providence, RI 02908

Re:

Changes to CMI Work Plan Former Ciba-Geigy Facility Lot 1102, 180 Mill Street Cranston, Rhode Island

REQUESTED

Dear Frank and Jeff:

As of January 4, 2019, BASF completed the removal of PCB-impacted soils and the installation of a partial protective clean soil cover that includes the required sub-grade material in accordance with the Final Corrective Measures Implementation Work Plan (CMI WP), final dated April 30, 2018, which was approved by EPA on June 19, 2018 (liner material where remaining PCB concentrations exceed 10 ppm, and geocomposite over all remaining PCB soil impacts > 1 ppm), and a uniform one foot of clean soil, seeded and maintained to date. The one-foot soil cover was placed and maintained to provide a protective cover until weather conditions conducive to finalizing the soil cover and vegetation support are realized. Remaining field work includes final clean soil cover installation to required protectiveness metrics (material thickness) and associated contouring and vegetation planting. These items are planned to be implemented immediately after approval of this request for CMI WP modification with associated Attachments. Specifically, two considered minor changes in the approved CMI Work Plan are now proposed to better position a portion of the covered area to potentially be modified as a parking area (at present only a conceptual possibility) in accordance with the ELUR as contemplated in the CMI WP, and to be recorded with the property deed.

CONSK

## Requested Change No. 1: Alter clean soil cover contouring and vegetation plan

BASF proposes to modify the soil cover contouring and vegetation plan to support the potential future use of a portion of the property as a parking lot, specifically that portion that is beyond the 200-foot setback from the river. This potential future use is supported by the contouring and vegetation plan provided in drawings RC-7 and RL-1 through 4. The plan includes the following changes

- Vegetation: The area beyond the 200' river setback will be maintained as an open field and planted with a wildflower mix, instead of the originally conceived upland habitat vegetation.
- Contouring: The area beyond the 200' setback will have a uniform grade, and the following alterations are proposed to accommodate surface water runoff control requirements associated with this design and potential parking area re-design (see drawing RC-7).
  - Stormwater retention basins have been moved to the periphery of the new open field.

SEMS DocID

National Presence • Regional Focus • Local Solutions www.aeiconsultants.com

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In the case that the open field is redesigned to support a parking area and assuming an impervious surface, stormwater flows from this area will be directed to the south toward several stormwater retention areas or towards lined tree wells which would be positioned in the central and peripheral portions of the property. Conceptually, stormwater runoff would follow the final grades depicted on drawing RC-7. Note that any property redevelopment beyond what is presented here will, at a minimum, be constrained by the ELUR as contemplated in the CMI WP, and to be recorded with the property deed.

# Requested Change No. 2: Modify clean soil cover design to support stormwater retention areas

To support the proposed contour plan and surface water runoff controls, it is proposed to alter the cover associated with the stormwater retention areas to consist of 6-inches of crushed stone laid over 6-inches of imported compliant soil, instead of 24-inches of compliant soil. This modification will avoid the need to import considerable compliant fill material to otherwise provide the design slopes. This modification is consistent with the CMI WP, Section 4.2.2, which specifies the option of installing a 1 ft soil cover (as described above) in the retention areas in the event that a 24-inch soil cover could not be physically constructed. This approach also remains consistent with the approved flood storage volume specified in the FEMA-approved Conditional Letter of Map Revision (CLOMR) issued to BASF on September 24, 2018 (Case#: 18-01-1205R).

For any questions, please do not hesitate to call. Thank you.

Sincerely,

**AEI Consultants** 

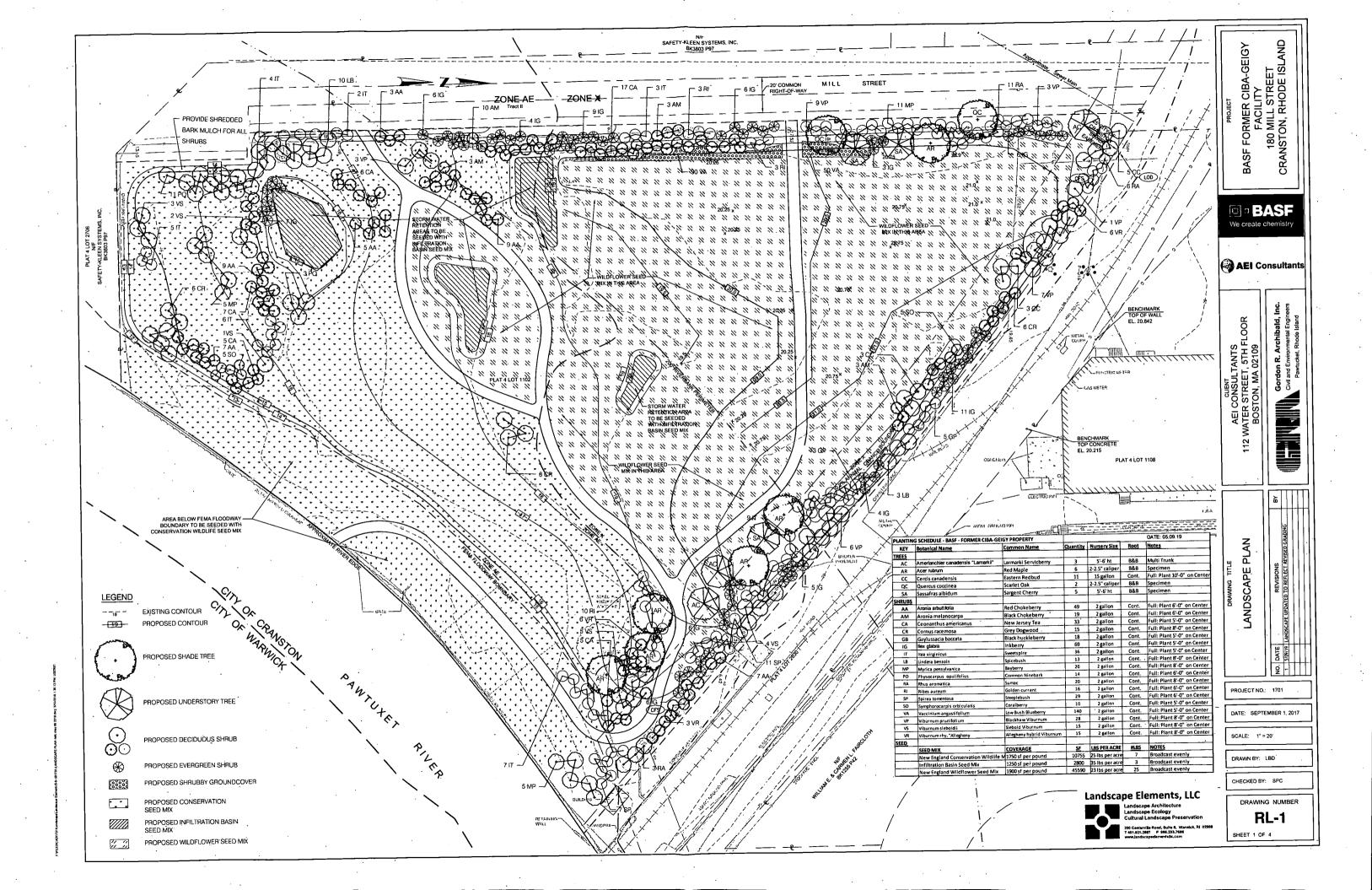
Richard G. Kowalski, CPG, LSP, CHMM

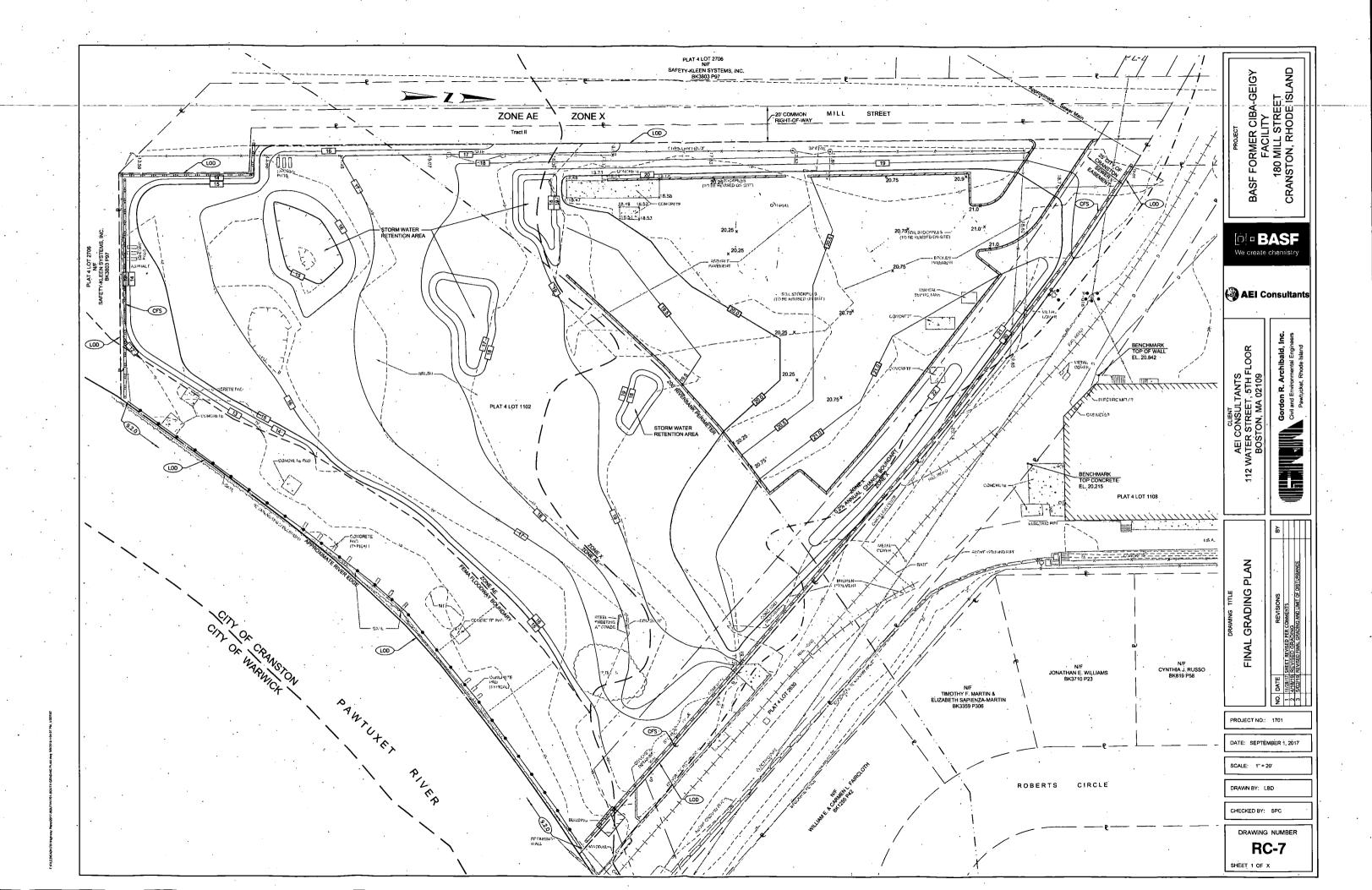
My & lande

Senior Hydrogeologist

Attachment

C: Joseph Guarnaccia, BASF





#### MIX FOR INFILTRATION BASINS

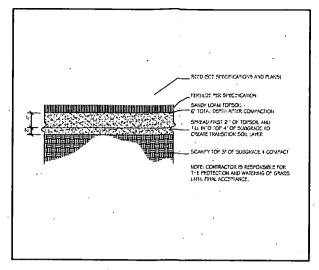
NEW ENGLAND EROSION CONTROL/RESTORATION MIX FOR DETENTION BASINS AND MOIST SITES - SPEC SHEET (PDF)

THE NEW ENGLAND EROSION CONTROL/RESTORATION MIX FOR DETENTION BASINS AND MOIST SITES CONTRAINS A SELECTION OF NATIVE GRASSES AND MULDFLOWERS DESIGNED TO COLONIZE GENERALLY MOIST, RECENTLY DISTURBED SITES WHERE QUICK GROWTH OF VEGETATION IS DESIRED TO STABILIZE THE SOIL SURFACE: IT IS AN APPROPRIATE SEED MIX FOR ECOLOGICALLY SENSITIVE RESTORATION. THAT RECUIRES STABILIZATION AS WELL AS LONG-TERM ESTABILISHMENT OF NATIVE VEGETATION.

THIS MIX IS PARTICULARLY APPROPRIATE FOR DETENTION BASINS THAT DO NOT HOLD STANDING WATER, MANY OF THE PLANTS IN THIS MIX CAN TOLERATE INFREQUENT INUNDATION, BUT NOT CONSTANT FLOODING, THE MIX MAY BE APPLIED BY HAND, BY MECHANICAL SPREADER, OR BY HYDRO-SEEDER, AFTER SOMING, LIGHTLY RAKE, ROLL OR CULTIPACK TO INSURE GOOD SEED TO SOIL CONTACT. BEST RESULTS ARE OBTAINED WITH A SPRING OR LATE SUMMER SEEDING, LATE FALL AND WINTER DORMANT SEEDING REQUIRES AN INCREASE IN THE APPLICATION RATE. A LIGHT MULCHING OF CLEAN, WEED-FREE STRAW IS RECOMMENDED.

APPLICATION RATE: 35 LBS/ACRE | 1250 SQ FT/LB PRICE: \$37.00/BULK POUND MINIMUM ORDER: 3 LBS

SPECIES: RIVERBANK WILD RYE (ELYMUS RIPARIUS), CREEPING RED FESCUE (FESTUCA RUBRA), LITTLE BILUESTEM (SCHIZACHYRIUM SCOPARIUM), BIG BILUESTEM (ANDROPOGON GERARDII), SWITCH GRASS (PANICUM VIRGATUM), UPLAND BENTGRASS (AGROSTIS FERENNANS), NODDING BUR MARIGOLD (BIDENS CERNUA), HOLLOW-STEM JOE PYE WEED (EUPATORIUM FISTULOSUM/EUTROCHIUM FISTULOSUM), NEW ENGLAND ASTER (ASTER NOVAE-ANGLIAE), BONESET (EUPATORIUM PERFOLIATUM), BLUE VERVAIN (VERBENA HASTATA), SOFT RUSH (JUNCUS EFFUSUS), WOOL GRASS (SCIRPUS CYPERINUS).



# WILDFLOWER AND CONSERVATION SEED MIX NOT TO SCALE

RI STATE WILDFLOWER MIX

58% LANCE .25 MIXED TO RI LEAVED COREOPSIS .5bs STATE SPECS

## **NEW ENGLAND WETLAND PLANTS, INC**

820 WEST STREET, AMHERST, MA 01002
PHONE: 413-548-8000 PAX 413-549-4000
EMAIL: HROPMEWP.COM WEB ADDRESS: WWW.NEWP.COM
New England Conservation/Wildlife Mix

Botanical Name	Common Name	Indicator
Elymus virginicus	Virginia Wild Rye	FACW-
Schizachyrium scoparium	Little Bluestem	FACU
Andropogon gerandii	Big Bluestem	FAC
Festuca rubra	Red Fescue	FACU
Sorghastrum mutans	Indian Grass	UPL
Panicum virgatum	Switch Grass	FAC
Chumaecristu fasciculata	Partridge Pea	FACU
Desmodium canadense	Showy Tick Trefoil	FAC
Asclepias tuberosa	Butterfly Milkweed	All
Bidens frondosa	Beggar Ticks	FACW
Eupatorium purpureum (Eutrochium maculatum)	Purple Joe Pye Weed	FAC
Rudbeckia kirta	Black Eyed Susan	FACU-
Aster pilosus (Symphytarichum pilosum)	Heath (or Hairy) Aster	UPL
Solidago juncea	Early Goldenrod	

The New England Conservation/Wildlife Mix provides a permanent cover of grasses, wildflowers, and legumes For both good erosion control and wildlife habitat value. The mix is designed to be a no maintenance seeding, and is appropriate for cut and fill slopes, detention basin side slopes, and disturbed areas adjacent to commercial and residential projects. New England Wetsand Plants, Inc. may modify seed intest at any time decending upon seed availability. The design criteria and ecological function of the mix will remain unchanged. Price is Shult pound, f00 warehouse, Plus SH and applicable taxes.

F.5.2.2. BIORETENTION SOIL

THE SOIL SHOULD BE A UNIFORM MIX, FREE OF STONE, STUMPS, ROOTS OR OTHER SIMILAR OBJECTS LARGER THAN TWO INCHES. NO OTHER MATERIALS OR SUBSTANCES SHOULD BE MIXED OR DUPED WITH IN THE BIORETENTION AREA THAT MAY BE HARMFUL TO PLANT GROWTH, OR PROVE A HINDRANCE TO THE PLANTING OR MAINTENANCE OPERATIONS. THE BIORETENTION SOIL SHOULD BE FREE OF NOXIOUS WEEDS.

THE BIORETENTION SYSTEM SHALL UTILIZE PLANTING SOIL HAVING A COMPOSITION AS FOLLOWS:

SAND: 85 - 88% SOIL FINES: 8 TO 12% (NO MORE THAN 2% CLAY) ORGANIC MATTER: 3 - 5%

NOTE: FOR BIORETENTION APPLICATIONS WITH A SOIL DEPTH OF LESS THAN 4 FEET, ADD 20% (BY VOLUME) OF WELL AGED (3 MONTHS), WELL AERATED, LEAF COMPOST (OR APPROVED EQUIVALENT) TO THE ABOVE PLANTING SOIL MIXTURE. WHERE SOIL FIRES CONTENT IS LESS THAN 12%, ADD A CORRESPONDING % OF LEAF COMPOST.

A TEXTURAL ANALYSIS IS REQUIRED TO ENSURE THE BIORETENTION SOIL MEET THE SPECIFICATION USTED ABOVE. THE BIORETENTION SOIL SHOULD ALSO BE TESTED FOR THE FOLLOWING CRITERIA:

PH RANGE
MAGNESIUM
PHOSPHORUS P<sub>2</sub>O<sub>5</sub>
POTASSIUM K<sub>2</sub>O
SOLUBLE SALTS

5.2 - 7.0 NO TO EXCEED 32 PPM NOT TO EXCEED 69 PPM NOT TO EXCEED 78 PPM NOT TO EXCEED 500 PPM

ALL BIORETENTION AREAS SHOULD HAVE A MINIMUM OF ONE TEST. EACH TEST SHOULD CONSIST OF BOTH THE STANDARD SOIL TEST FOR PH, PHOSPHORUS, AND POTASSIUM AND ADDITIONAL TESTS OF ORGANIC MATTER, AND SOLUBLE SALTS.

SINCE DIFFERENT LABS CALIBRATE THEIR TESTING EQUIPMENT DIFFERENTLY, ALL TESTING RESULTS SHOULD COME FROM THE SAME TESTING FACILITY.

SHOULD THE PH FALL OUT OF THE ACCEPTABLE RANGE, IT MAY BE MODIFIED (HIGHER) WITH LIME OR (LOWER) WITH IRON SULFATE PLUS SULFUR.

INFILTRATION BASIN SEED MIX - APPLICATION RATE 3.5 PER 1,000 SF.

35% TURF TYPE TALL FESCUE 20% SMOOTH BROMEGRASS 30% CREEPING RED FESCUE 5% KENTUCKY BLUEGRASS 10% REDTOP BASF FORMER CIBA-GEIGY
FACILITY
180 MILL STREET
CRANSTON, RHODE ISLAND

☐ □ BASF We create chemistry



AEI CONSULTANTS
112 WATER STREET, 5TH FLOOR
BOSTON, MA 02109
Gordon R. Archibald, In



DRAWING TITLE

LANDSCAPE DETAILS 3

DATE REVISIONS BY

\$58-18 SHEET REPLACED

SAB-18 SHEET REPLACED

SAB-18 SHEET REPLACED

PROJECT NO.: 1701

DATE: SEPTEMBER 1, 2017

SCALE: 1" = 20

DRAWN BY: LBD

CHECKED BY: SPC

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PL-4

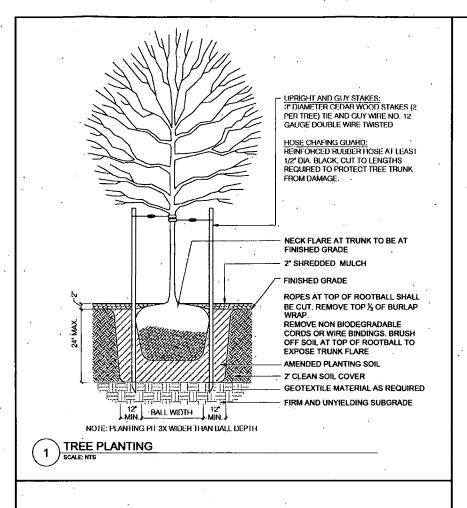
SHEET 1 OF 4

Landscape Elements, LLC

Landscape Ecology

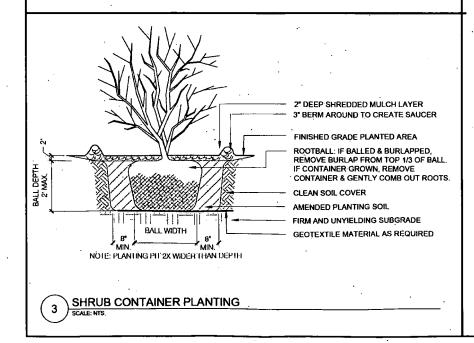
Cultural Landscape Preservation

200 Centerville Road, Sulfa 6, Warwick, RJ 02898
T401.021,0267 F 856.203,7686



PLANT CENTER, TYP.
D= TYPICAL ON CENTER SPACING
AS INDICATED IN PLANT SCHEDULE

SHRUB AND HERBACEOUS PLANT SPACING
SCALE NTS



## **GENERAL PLANTING NOTES:**

- 1) Containerized shrubs will be planted as shown on plant schedule
- 2) For containerized stock, all plants should be pre-inspected by the planting contractor to help ensure quality, proper hardening (2-week minimum), and species correctness. Any dead, dying, stressed, or badly "root-bound" plants will be rejected. Holes will be dug twice the width and equal to the depth of the root ball of the plant. Holes will be watered before planting, then filled, tamping down the soil to remove air pockets, and watered again immediately. Care should be taken to ensure that the installed containerized materials are not covered by mulch at the time of product application.
- 3) The seed should be applied through broadcast seeding, hand-raked to %-to %-inch depth to minimize seed loss, then surface-pressed through a water-filed press-wheel to facilitate good seed-to-soil contact. All seed must be labeled as 'certified' and should not include the presence of noxious or invasive species prohibited by the State of Rhode Island. All seed should be inspected prior to installation and all tags must be maintained for documentation by the resident engineer. Prior to delivery, seed should be processed by the seed provider on a "gravity-table" to remove non-target seed types and potentially invasive species. Seeding will only be performed between September 1 and when the ground freezes and when the ground thaws and June 1st.
- 4) No equipment will be allowed in the restoration area after seeding or planting
- 5) Chemical and/or mechanical weed abatement should be facilitated by the client to assist in eradication of invasive and noxious weeds. The control of noxious and/or invasive species should be based upon site monitoring for a minimum of three-growing seasons following establishment. An iterative weed management plan should be implemented by the client based upon the results of monitoring.
- Construction equipment, fuels, and other petroleum products shall not be stored or stockpiles with 50 feet of the creek or other aquatic habitats. Fueling should only occur within approved designated areas.

BASF FORMER CIBA-GEIGY
FACILTY
180 MILL STREET
CRANSTON, RHODE ISLAND





1 FLOOR 39 Archibaid, Inc.

Gordon R. Archib

PLANT DETAILS, NOTES,
& SCHEDULE

PROJECT NO.: 1701

DATE: FEBRUARY 2018

SCALE: AS NOTED

DRAWN BY: MK



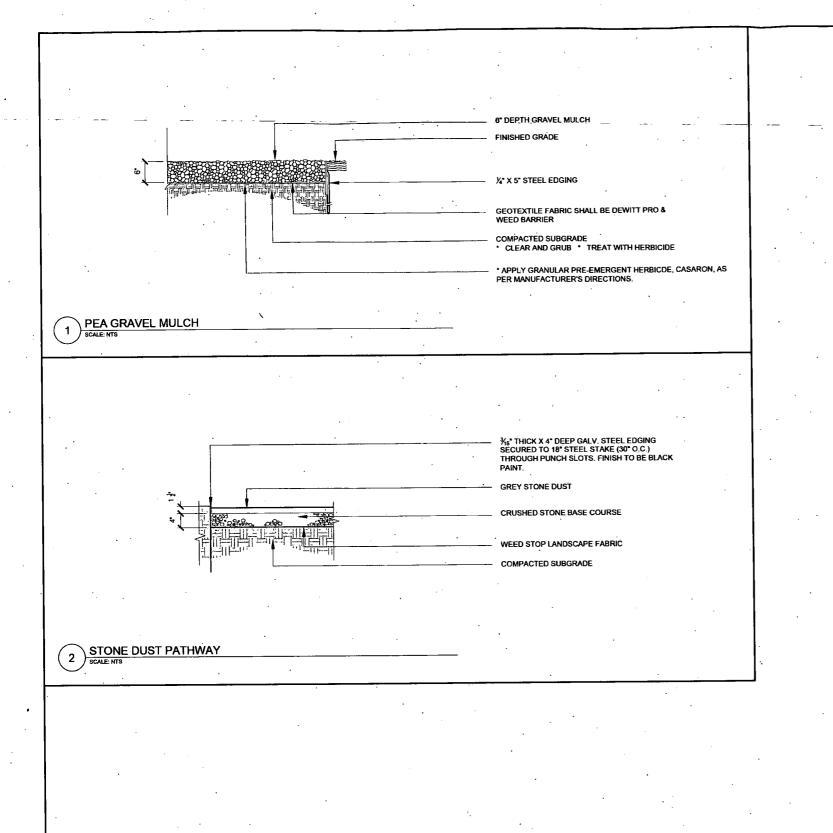
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RL-2

SHEET X OF X

GREATECOLOGY

SNYIZBANNETT - DESIGN
315 W 325 Seven
306 Floor
Hey York, NY 10018
11 (272) 5/19 (200)



BASF FORMER CIBA-GEIGY FACILTY 180 MILL STREET CRANSTON, RHODE ISLAND B-BASF

DRAWING TITLE SITE DETAILS

PROJECT NO.: 1701

DATE: FEBRUARY 2018

SCALE: AS NOTED

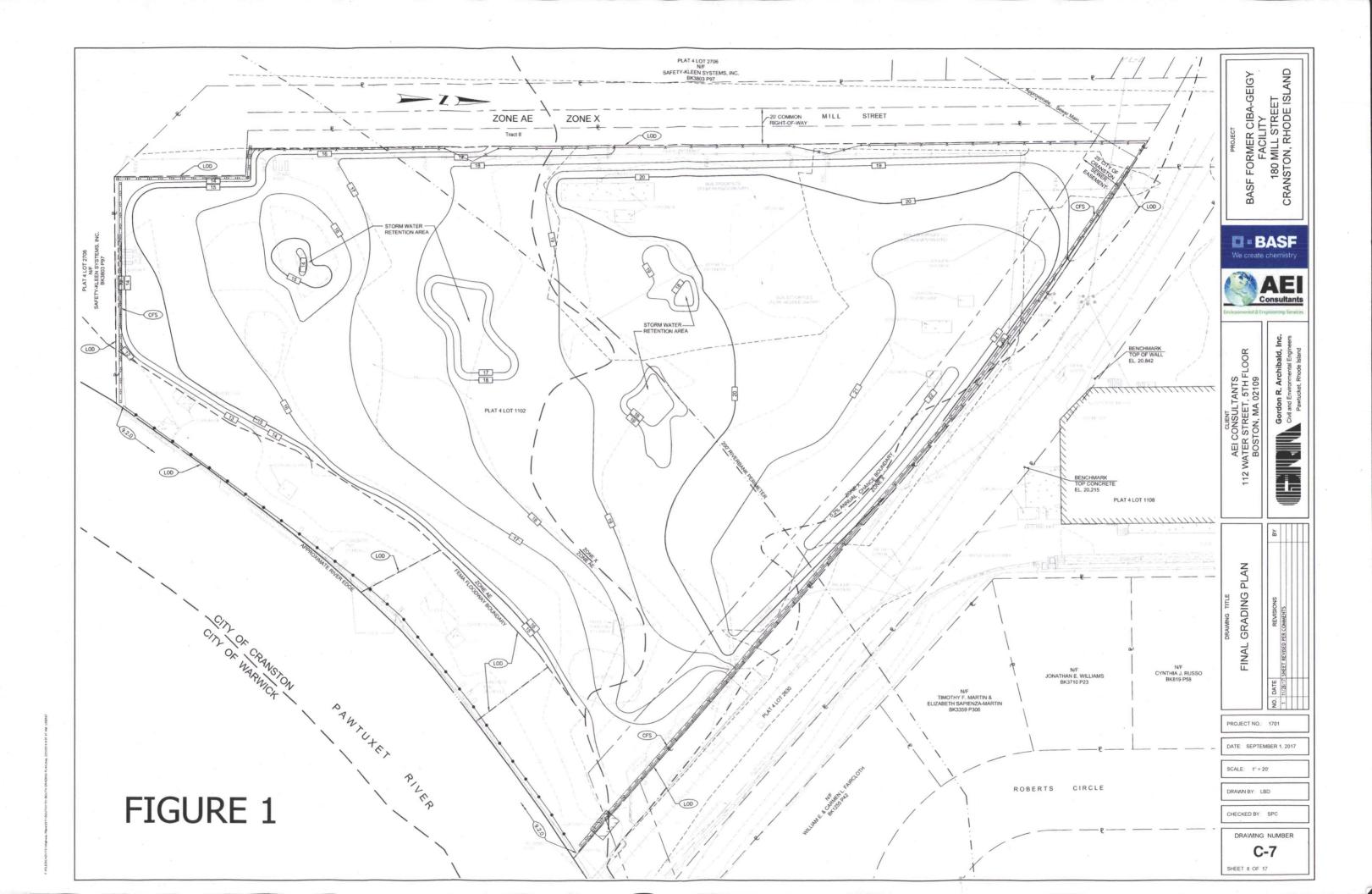
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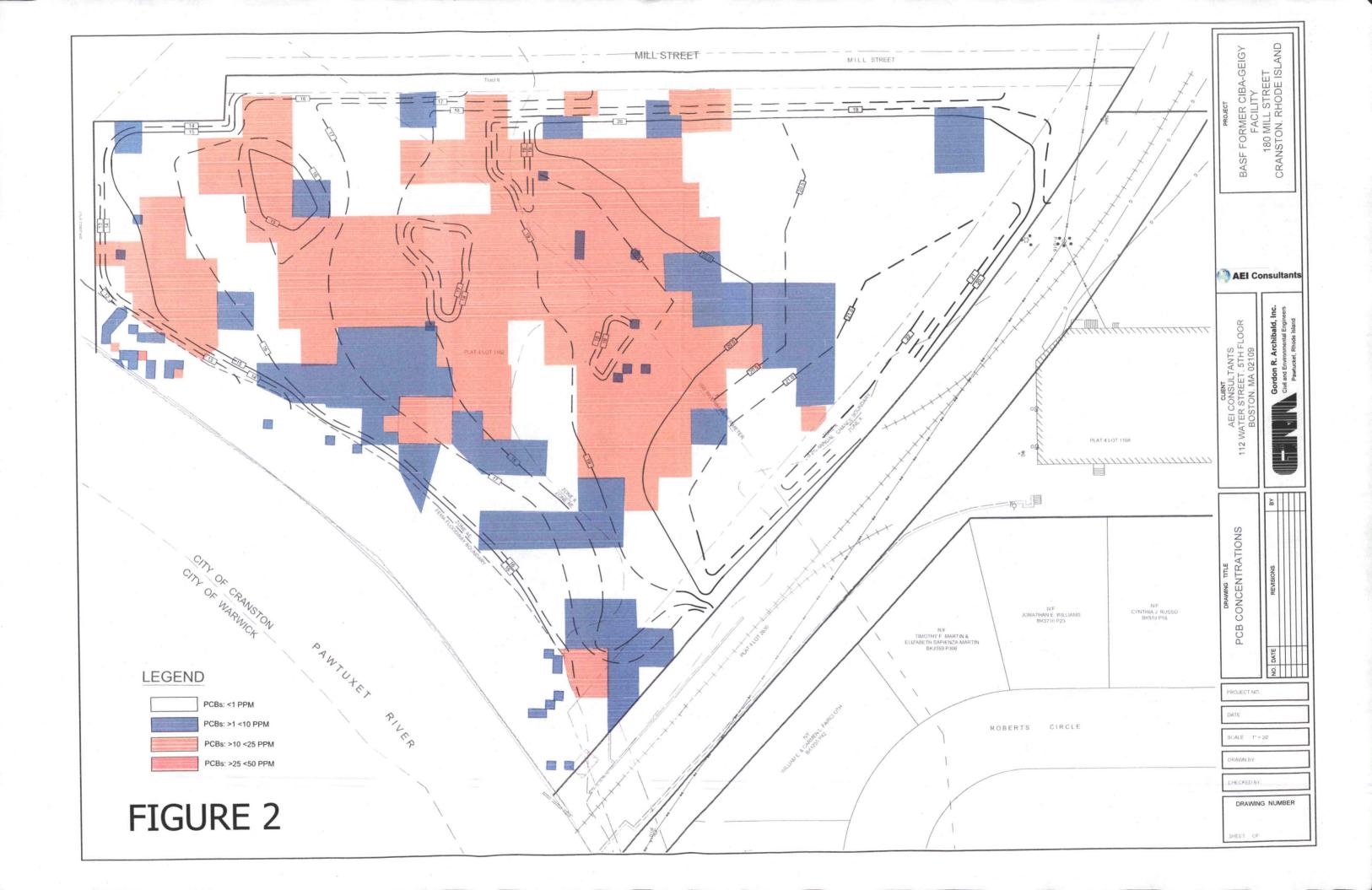


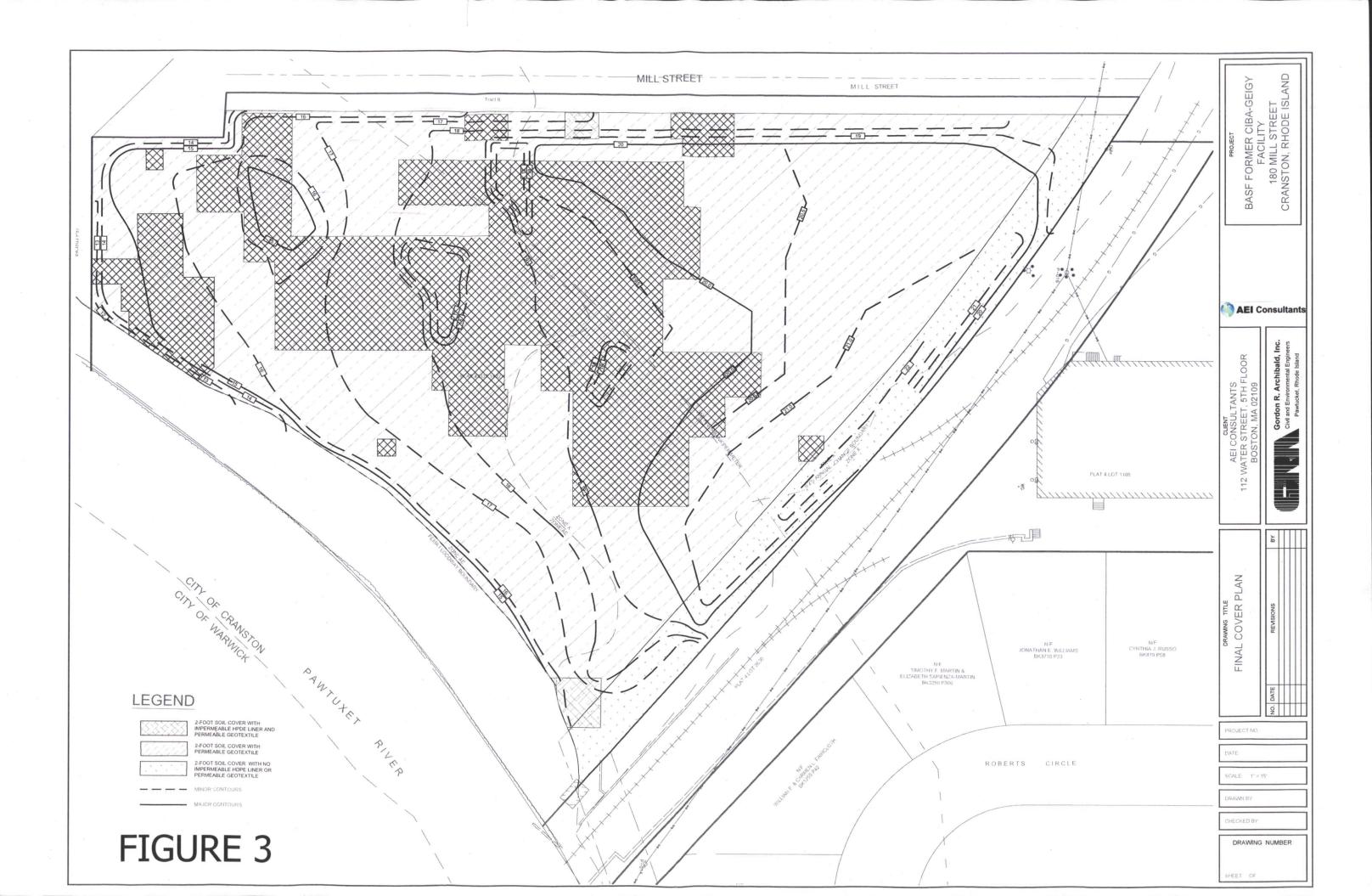
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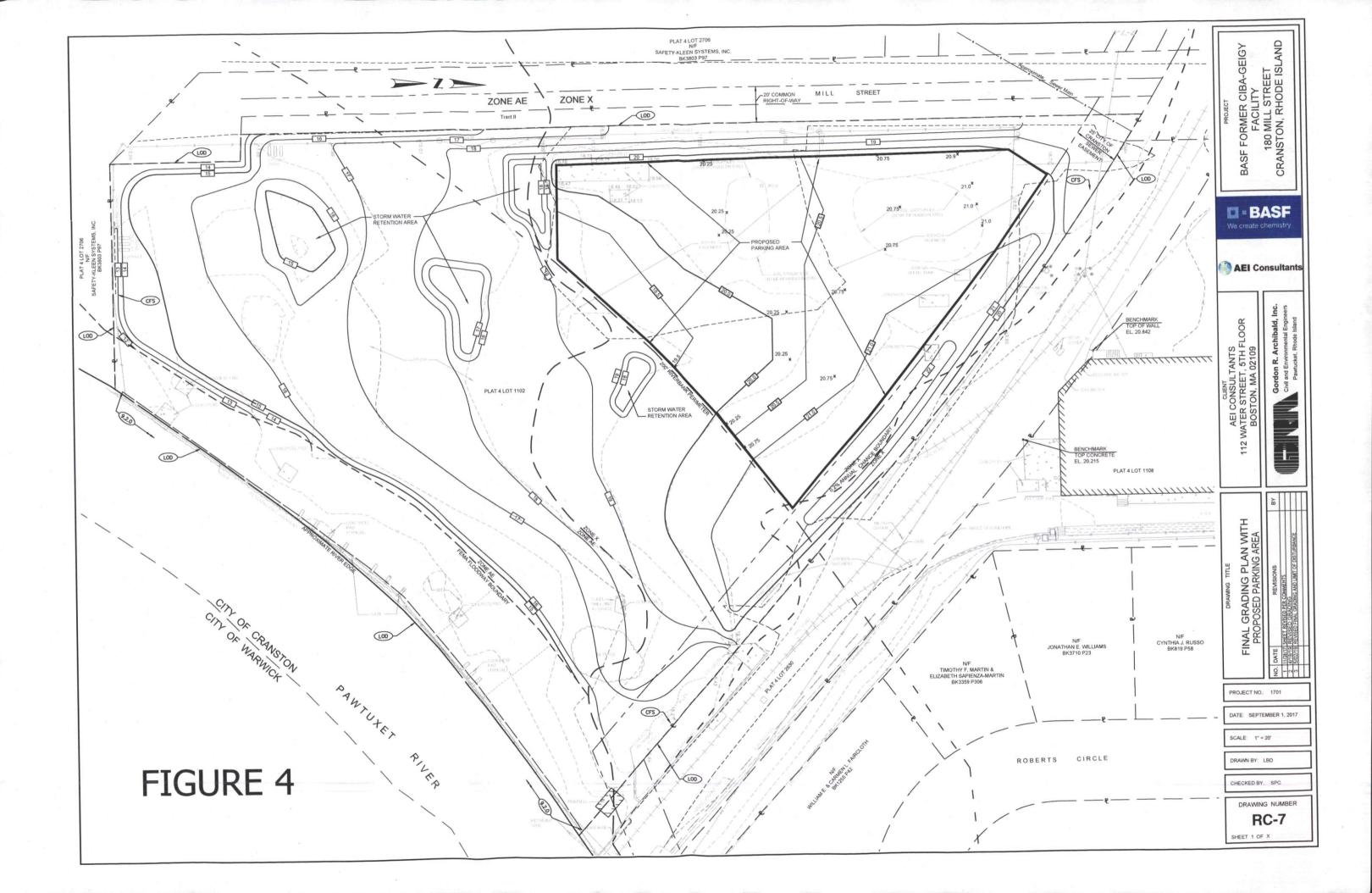
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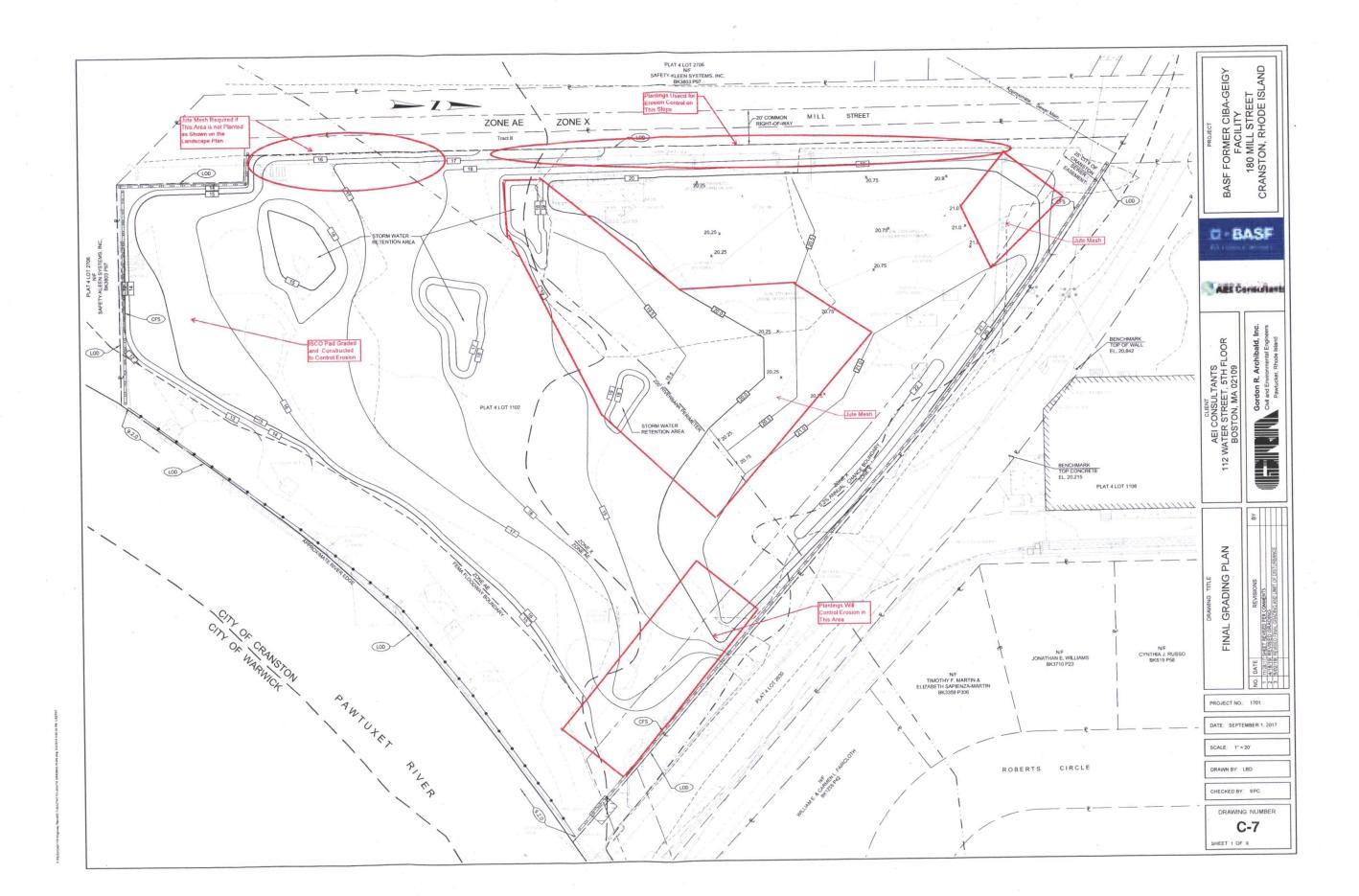
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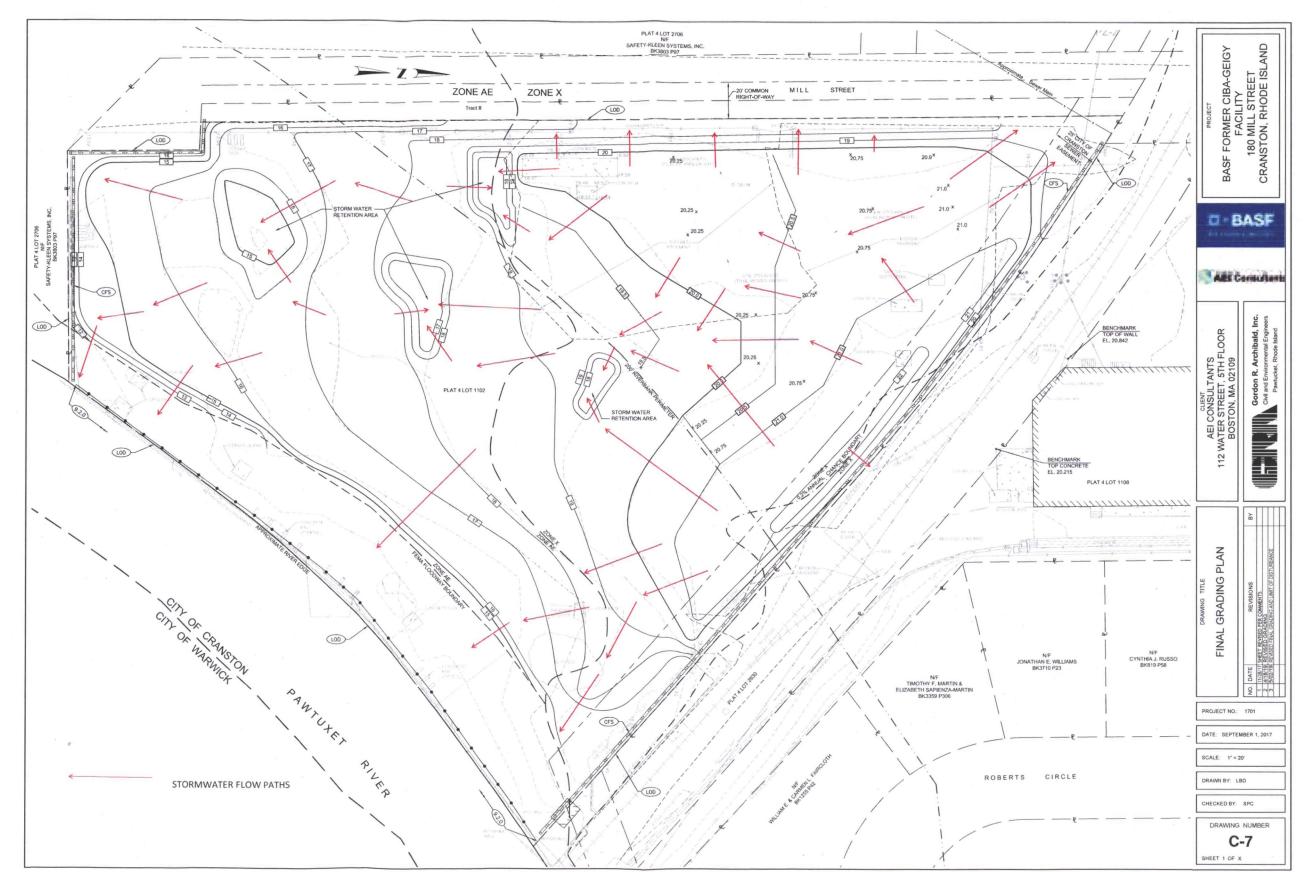












Prighusy Plans(2017-50/UTH) 11:50/UTH GRADBYG PLAN, dwg

